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December 9, 2003

Marianne L. Horinko, Acting Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for Fluorobenzene

Dear Acting Administrator Horinko:

The following comments on DuPont's test plan for the chemical Fluorobenzene are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

E. I. duPont de Nemours & Company, Inc. submitted its test plan on June 25, 2003 for the chemical Fluorobenzene (CAS No. 462-06-6). A substantial number of physicochemical, fate, and toxicity studies have been conducted with fluorobenzene, as well as structurally similar halobenzenes, such as chlorobenzene and chloro-fluorobenzenes. Although the sponsor does not specify how fluorobenzene is used, DuPont has submitted a comprehensive analysis of fluorobenzene by compiling existing data from a variety of sources. For instance, developmental toxicity studies on a chlorobenzene, a close structural analog of fluorobenzene, and *in silico* analysis of both chemicals were used to bridge data gaps for the developmental toxicity endpoint for fluorobenzene. This is a scientifically valid analysis for considering the toxicity of a chemical and these approaches demonstrate a thoughtful analysis by DuPont.

Fluorobenzene is a liquid that is transported to the U.S. in isotanks, pumped directly into steel tanks for storage, and finally, pumped into reactors for processing. This chemical is consumed by reaction with all residual fluorobenzene recovered and recycled. We concur with DuPont that this chemical classifies as a closed system intermediate, eliminating the need for repeated dose and reproductive toxicity testing in the SIDS battery. In addition, this company considers potential exposure to fluorobenzene and has established good industrial hygiene practices, including personal protective equipment (PPE), to protect workers from exposure.

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Dupont has also established an Acceptable Exposure Limit (AEL) for fluorobenzene at 25ppm.

We commend the sponsor on a well-written, thorough test plan for fluorobenzene and concur that no additional animal testing is needed for the purposes of the HPV program. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research